

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ALABAMA
NORTHERN DIVISION**

In re:

KATRINA L. PARKER
SSN: xxx-xx-5558

Debtor.

)
)
)
)
)
)

Case No. 16-82144-CRJ-13

CHAPTER 13

**OBJECTION TO PROOF OF CLAIM NUMBER 4 FILED BY
ALLY FINANCIAL AND NOTICE OF OPPORTUNITY FOR HEARING**

Comes now the Debtor, KATRINA L. PARKER, and hereby objects to Claim Number 4 of Ally Financial filed on August 16, 2016 in the amount of \$23,460.00 secured and \$3,699.74 unsecured and as grounds therefore would show as follows:

1. The Debtor has suffered the complete loss of the 2011 Cadillac CTS securing creditor's claim.
2. The Debtor has filed a Motion for an Order directing payment of the insurance proceeds to the creditor, Ally Financial.
3. The Debtor objects to claim number 4 filed by Ally Financial and would pray that the balance of said claim be disallowed due to the total loss of the vehicle and that the claim be reduced to the amounts paid. The Creditor should be given ninety days within which to file a deficiency balance claim or to be barred.

WHEREFORE , THE FOREGOING PREMISES CONSIDERED, the Debtor, Katrina Parker, hereby objects to claim number 4 filed by Ally Financial and would pray that said claim be reduced to the amounts paid and further payment on said claim be disallowed with leave being given to the creditor to file a deficiency balance claim within ninety days or to be barred.

/s/ Brandon N. Smith
BRANDON N. SMITH
Attorney for Debtor
908-C North Memorial Parkway
Huntsville, AL 35801
(256) 533-5097

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing has been served upon the following by depositing copies of this objection in the United States mail, properly addressed and postage prepaid, on this the 26th day of July, 2017.

Kia Vang, Claim Signatory
Ally Servicing, LLC
4000 Lexington Ave., N., Ste 100
Shoreview, MN 55126

Hon. Michele T. Hatcher, Trustee
PO Box 2388
Decatur, AL 35602

Ally Financial
PO Box 130424
Roseville, MN 55113-0004

/s/ Brandon N. Smith
Attorney for Debtor